

# *IRM – C&C Company*

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P.O. Box 645 • White Pine, Tennessee 37890 • Telephone (865) 674-0838 • Facsimile (865) 674-2352

Mr. Wade Murphy - Permit Section  
Division of Water Pollution Control  
6<sup>th</sup> Floor, L&C Annex - 401 Church Street  
Nashville, TN 37243-1534

March 2, 2012

**RE:** Arrington Vineyard & Russell/Brooks Property – Williamson County  
SOP # 11022

Dear Mr. Murphy,

IRM-C&C Company has a question with regard to the need for a Minor Modification of the State Operating Permit for the above referenced property.

The initial system was approved by the Tennessee Department of Environment and Conservation, Division of Groundwater Protection, Williamson County Department of Sewerage Disposal Management. The permittee's would like to request that the pump and haul practice be accepted as an option during construction change over from the current system to the system under construction. There may be times when effluent will need to be pumped to allow modifications necessary and the interruptions of flows during construction. This will allow the on-going business to continue to be open and operate.

Furthermore, The Permittee's have been operating an upscale temporary portable men and women's toilet for over three years. The toilet has fresh potable water for the sinks and is lighted with heaters. The toilet facility is equipped with a high level alarm. They have also operated a rental unit during peak seasons. The portable toilets have been managed without incident. As part of the construction of the newly permitted system, the Permittee's desire to install part of the Septic Tank Effluent Pumping (STEP) system and utilize it as an expansion of capacity for the portable toilet. The pump tank will be able to be relocated when the complete wastewater system is on line. The portable toilet pump and haul will cease when the permitted system is completed.

A permitted pumper; TN #538, Williamson County Septic Service of Thompson Station, Tennessee, has been managing the portable toilets and will continue to serve the Arrington site. The owner/operator, Mr. Gene Thomlin indicates that he hauls to the Thompson Station POTW.

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Due to the fact that this is critical to perform these practices during construction, the Permittee's request is that this be accepted as part of the existing SOP Permit and will not require an additional SOP Permit.

We look forward to your response. Please call if you have any questions or need any further information. Thank you.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Jeffrey W. Cox, Sr.", with a stylized flourish at the end.

**Jeffrey W. Cox, Sr. RPSS**  
**TN Licensed Wastewater/Collection System Operator**

**CC:     Jamie Reed, SEC**  
**John Russell, Russell/Brooks & Arrington**

**JWCSr/mjc**